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November 1, 2000

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David Waddell  
Tennessee Regulatory Authority  
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Nashville, TN 37243

Re: Generic Docket to Establish UNE Prices for Line Sharing Per FCC 99-355,  
and Riser Cable and Terminating Wire as Ordered in TRA Docket 98-  
00123  
Docket No. 00-00544

Dear David:

Please accept this revised Response on behalf of the Data Coalition in the above referenced proceeding. The filing made yesterday inadvertently contained the wrong attachment. A copy of this revised filing is being hand delivered to Guy Hicks, counsel for BellSouth.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

Henry Walker

HW/nl  
Attachment

POSTED  
11-2-00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

RECEIVED  
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EXECUTIVE SECRETARY

In Re: )  
Generic Docket to Establish UNE Prices for )  
Line Sharing Per FCC 99-355, and Riser Cable ) Docket No. 00-00544  
And Terminating Wire as Ordered in TRA )  
Docket 98-00123 )

**THE DATA COALITION'S RESPONSE TO BELL SOUTH'S OBJECTIONS TO  
COVAD'S SECOND INTERREGATORIES AND SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Broadslate Network of Tennessee, Inc. ("Broadslate"), and Vectris Telecommunications, Inc., ("Vectris") by undersigned counsel, and on behalf of the Data Coalition, respond to BellSouth Telecommunications, Inc. ("BellSouth") objections to Covad's Second Interrogatories and Second Request for Production of Documents. The Data Coalition respectfully requests that the Tennessee Regulatory Authority ("Authority") deny BellSouth's objections and require BellSouth to provide the requested discovery. In the alternative, Broadslate and Vectris respectfully request that the Authority grant Broadslate and Vectris leave to late file discovery for good cause as set forth below.

**A. The Scope of This Docket and Background of the Discovery Dispute**

The Authority initiated this docket to consider BellSouth's rates for unbundled network elements competitive entrants need to provide xDSL services in the State of Tennessee. Broadslate, Vectris and Covad are each individual parties in this docket and participate in this docket as the "Data Coalition." The members of the coalition determined that since they shared similar interests in reviewing BellSouth's proposed recurring and non recurring rates for these

network elements, it was more efficient for the parties and the Authority if it combined its efforts in this proceeding. The majority of pleadings filed by the members of the Data Coalition have been filed jointly.

On October 10, 2000, Covad filed its Second Set of Interrogatories and Request for Production of Documents; consistent with the procedural schedule established by the Authority. However, the request was inadvertently identified as Covad's discovery request rather than a discovery request from the Data Coalition. BellSouth objected to the second set of interrogatories on the grounds that Covad had exceeded this Authority's limit of 40 discovery requests, pursuant to 1220-1-2-.11(5)(a). BellSouth further objected to eleven interrogatories on the grounds that they were overly broad, unduly burdensome, and not relevant to issues in the docket.

As the Authority is aware, this proceeding is on an accelerated timetable and neither the parties nor the Authority has the luxury to engage in drawn out disputes over discovery. The hearing in this docket is scheduled to begin in less than one month. If BellSouth does not produce the information to which the Data Coalition is entitled substantially before that date, the Data Coalition be unable to sufficiently analyze the information and cross-examine BellSouth's witnesses. The information the Data Coalition requests is highly relevant to this cost proceeding so that the parties can determine the underlying basis and assumptions for all of BellSouth's recurring and nonrecurring charges.

**B. The Nature of the Information Requested**

Although the Data Coalition is able to use some general information from pricing dockets in other states, there is additional information necessary to this proceeding that has not been obtained from BellSouth. For example, eleven of the requests to which BellSouth specifically objects involve Tennessee specific information, which was not requested or produced in any

prior docket. Twelve of the interrogatories request information on the provisioning of dark fiber, a new UNE about which BellSouth has produced virtually no information. Furthermore, none of the depositions taken in either North Carolina or Florida explain how BellSouth arrived at its proposed charges for this UNE. An additional dozen requests flow from responses made by BellSouth witnesses at pricing hearings in other states, which statements require the Data Coalition to follow-up.

The specific objections raised by BellSouth all relate to questions posed about the numbers of conditioning jobs BellSouth performed in Tennessee on its own retail ISDN, T-1 and DS-1 services. This information is critical for CLECs to understand the conditioning charges proposed by BellSouth. For example, BellSouth proposes to charge competitors a conditioning additive of over \$50 per loop. This additive is intended to insure that BellSouth fully recovers its costs of conditioning, and it is based in part on BellSouth's assumptions about how many conditioned loops it will need for either its xDSL services or for other retail offerings which also require conditioned copper loops. The Data Coalition requests information about past conditioning work actually done and future predictions of line count so it can better evaluate BellSouth's myriad assumptions about the scope and costs of its conditioning activity. The Data Coalition has revised its requests to limit the number of years for which information is requested, in an effort to decrease the burden on BellSouth. The number of different types of circuits sold should be relatively easy for BellSouth to obtain and the number of loops for which conditioning work is performed will necessarily support or undermine BellSouth's assumptions in its studies.

Although BellSouth routinely denounces discovery as burdensome and expensive, discovery is actually the most efficient way to allow parties to understand and frame the issues for the Authority, saving time for experts and for the Authority during the hearing. Discovery

allows parties to obtain the facts prior to hearing, so that our experts can refine their testimony in advance of filing it and so the Data Coalition can target its cross-examination accordingly. Furthermore, discovery ensures that the Data Coalition will receive answers to its questions, even if BellSouth chooses not to bring witnesses to the Tennessee hearing that are competent to answer the questions. Without the requested discovery material, the Data Coalition cannot fully examine or probe BellSouth's proposed costs. The terms, rates, and conditions on which BellSouth provides its retail or wholesale ADSL services is central to the analysis of whether BellSouth is providing UNEs on nondiscriminatory and reasonable basis to all providers of xDSL services.

### **C. Attempts to Resolve the Dispute**

The Data Coalition attempted resolve this discovery dispute between the parties, but BellSouth was willing only to consider whether it would answer a “half dozen” additional questions. BellSouth appears to take the position that because of the volume of discovery taken in Florida and North Carolina, as well as the first set of discovery requests by Covad in this docket, BellSouth has responded to all of the discovery that the Data Coalition should need. That is simply not the case. In every state, the members of the Data Coalition learn more about how BellSouth develops its costs and how the members of the Coalition can find the information necessary to unravel the mysteries of the BellSouth cost studies. What its members did or did not ask in previous dockets should not hamstring the Data Coalition. These requests should be judged on their own merits. This Authority should require that BellSouth respond to such discovery as is necessary to obtain the truth. BellSouth bears the burden of proof and support of its cost studies. If it will not respond to discovery, a cost and time saving device, BellSouth must be prepared to bring witnesses to the hearing that are competent to answer the identical questions

posed by the Data Coalition. Otherwise, BellSouth's cost studies will remain a "black box," accessible and understandable only to BellSouth, in whose interest it is to raise costs to competitors.

Despite its belief that all of the discovery requests contain critical information, the Data Coalition has reviewed its previous requests and has refined the requests to limit their scope without compromising the value of the information obtained. Attached to this pleading is a revised list of discovery requests. These revised requests will decrease the burden on BellSouth and facilitate the receipt of the necessary information for this case. First, the request eliminates sixteen interrogatories, so the number decreases from 52 to 36. Second, the request further reduces the scope of the remaining interrogatories by requesting information on a more limited group of yearly data from BellSouth. Third, the request also reduces its request for production of documents from 11 to 10. The Data Coalition takes these steps to prove that its requests reflect legitimate needs for discovery critical to its ability to probe BellSouth's cost studies.

#### **D. Request for Relief**

Although the Authorities rules of procedure limit each party to 40 discovery requests in a normal case, the ongoing docket presents a number of critical exceptions to that rule. First, BellSouth is the only party with the information requested. BellSouth has proposed rates and has the sole obligation of supporting those rates. In light of this, the Authority may waive the limitation at its discretion. Second, according to the Authority's rules, Broadslate, Vectris, and Covad are each individually entitled to propound 40 discovery requests on BellSouth for a total of 120 requests. When two or more parties are filing together as a coalition, equity suggests the parties should not be required to forego the amount of discovery to which they are entitled under the rules when acting individually. In short, parties should not be penalized for filing joint

discovery. The first and second sets of discovery Covad timely propounded on BellSouth on behalf of the Data Coalition, contained substantially less than the 120 the individual members of the Data Coalition would be entitled to under the rules if acting independently.

The Data Coalition requests that the Authority consider Covad's First and Second set of discovery requests as requests from the Data Coalition-including Broadslate, Vectris and Covad. In accordance with that determination, the Authority should require BellSouth to respond to Covad's second set of discovery requests, as revised (See attached).

In the alternative, Broadslate and Vectris respectfully request leave to late file the enclosed discovery requests. Broadslate and Vectris have the independent right, under the Authority's rules, to propound 40 data requests. We request that the Authority exercise its discretion to allow Broadslate and Vectris to file these revised discovery requests. Again, considering that BellSouth has had these requests in their possession for almost two weeks BellSouth will not be prejudiced in being required to answer.

The Authority should find good cause, as required under rule 1220-1-2-.11(5)(a), to grant this motion. Both Broadslate and Vectris were under the impression that the enclosed discovery request would be filed jointly with Covad as the Data Coalition. Due to a clerical oversight and the pressure of meeting the procedural schedule, the headings were never changed to reflect the parties' intent to conduct discovery jointly.

WHEREFORE, Broadslate and Vectris respectfully request that the Authority

1. Consider Covad's October 10, 2000 Second Set of Interrogatories and Requests for Production, as a Joint discovery request from the Data Coalition and require BellSouth to promptly answer each request; or in the alternative,
2. Grant Broadslate and Vectris leave to late file the attached discovery request upon

BellSouth and order BellSouth to promptly answer each request.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

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Counsel for Covad Communications, Inc.

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Joshua M. Bobeck, Esq.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, Suite 300  
Washington, DC 20007

Counsel for Broadslate Networks



**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

In Re:	)	
Generic Docket to Establish UNE Prices for	)	
Line Sharing Per FCC 99-355, and Riser Cable	)	Docket No. 00-00544
And Terminating Wire as Ordered in TRA	)	
Docket 98-00123	)	

**BROADSLATE NETWORKS' FIRST SET OF INTERROGATORIES**  
**AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**  
**TO BELL SOUTH TELECOMMUNICATIONS, INC.**

Broadslate Networks of Tennessee, Inc. ("Broadslate") and Vectris Telecommunications, Inc. ("Vectris") hereby serve its First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth") in writing, under oath.

Please provide the name, address and relationship to BellSouth of each person providing answers to the following interrogatories, and identify which question(s) each person answered.

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc, its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "Cost Study," "Cost Studies," "Cost Model," and "Cost Models" refer to the "recurring cost studies," including all study summaries, work papers, study inputs and supporting documentation filed by BellSouth in this proceeding.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable

law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" or "or" as used herein shall be constructed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information that would not otherwise not be brought within their scope.

8. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

9. “Identify” or “identifying” or “identification” when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

10. “Identify” or “identifying” or “identification” when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

11. “Identify” or “identifying” or “identification” when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;

- f) the identify of each person to whom it was sent;
- g) the identify of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is not longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

### **INTERROGATORIES**

1. Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (SSIM) for connection, testing, and service orders, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

2. Please explain in detail the tasks involved with the dark fiber cost study input for central office installation and maintenance circuit and facilities (NTEL) for connection, testing, and service orders, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

3. Please explain in detail the tasks involved with the dark fiber cost study input for installation and maintenance – special services (travel) (SSIM), for connection and testing,

and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

4. Please explain in detail the tasks involved with the dark fiber cost study input for access customer advocate center (UNEC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

5. Please explain in detail the tasks involved with the dark fiber cost study input for customer point of contact (LCSC) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

6. Please explain in detail the tasks involved with the dark fiber cost study input for circuit provisioning group (CPG) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

7. Please explain in detail the tasks involved with the dark fiber cost study input for outside plant engineering (FG30), for engineering and service inquiry, and how BellSouth arrived at the amount of time allocated to such tasks, including identification of the subject matter expert(s) who provided support for this input in the cost study.

8. Please explain in detail the tasks involved with the dark fiber cost study input for network and engineering planning (FG20) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

9. Please explain in detail the tasks involved with the dark fiber cost study input for complex resale support group (CRSG) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

10. Please explain in detail the tasks involved with the dark fiber cost study input for circuit capacity management (CCM) and how BellSouth arrived at the amount of time allocated to such task, including identification of the subject matter expert(s) who provided support for this input in the cost study.

11. Please explain in detail the difference between outside plant engineering and network & engineering planning tasks for dark fiber.

12. Please explain in detail how BellSouth arrived at the life of the cost element as 52 months for dark fiber.

13. Please explain in detail why all dark fiber LCSC work times are manual.

14. Please describe in detail the process by which BellSouth makes dark fiber UNEs available to CLECs. Your complete response will include the manner of interconnection, the ordering and provisioning process, and any other processes BellSouth must undertake to make dark fiber available.

15. In 1999, how many service orders for BellSouth's retail services in Tennessee (i.e., non-UNEs or resale facilities) required conditioning activities to provision?

16. How many BellSouth service orders pertaining to BellSouth's retail services does BellSouth anticipate will require conditioning activities? Please provide this information for the following timeframes: 2000, and 2001.

17. Please provide the number of these circuits whereby a service order was issued

for purposes of undertaking conditioning activities.

18. Please provide the total number of ISDN-PRI circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

19. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

20. Please provide the total number of ISDN-BRI circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

21. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

22. Please provide the total number of T-1 or DS-1 circuits sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

23. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

24. Please provide the total number of digital circuits below T-1 capacity (e.g., 64 kbps, 56 kbps, etc.) sold by BellSouth in Tennessee in 1998, 1999, 2000 (year to date).

25. Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

26. Please provide the total amount of expense BellSouth booked for conditioning activities (i.e., removing load coils, removing bridged tap or removing repeaters and/or other devices disruptive to digital services) in 1998, 1999, and year to date 2000.

27. How many load coils are currently placed in BellSouth's Tennessee network?

28. How many of the load coils identified in response to the question above are housed in underground, manhole environments?

29. Please admit or deny that BellSouth's employees in Tennessee utilize electronic maps of BellSouth's facilities in performing their job functions.

30. If the answer to the question above is anything other than an unequivocal "Deny," please list each such database used by BellSouth's employees. Your complete answer will include a description of each database and the primary function it serves for BellSouth's employees.

31. When a CLP requests loop makeup information on a loop whose information is not currently included in the Loop Facilities Assignment Control System (LFACS) and Manual Loop Makeup activities are required (and a Manual Loop Makeup charge is assessed), is the information obtained from that Manual Loop Makeup inquiry then entered into LFACS such that that loop can be accessed via the mechanized loop makeup process in the future?

32. Please describe in detail how BellSouth created the technical specification for the UCL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.

33. Please describe in detail how BellSouth created the technical specification for the ADSL loop, how those specifications were revealed to the CLECs, and what opportunity CLECs had, or currently have, to request changes to those technical specifications.

34. Please identify BellSouth's subject matter expert(s) for line sharing operation support systems updates, including the person(s) who can explain with specificity the cost of the project, the type of upgrades required, the functionality of the upgrades, the work activities necessary to complete the upgrades, the work activities necessary to maintain the upgrades, the type of employees/consultants BellSouth will use for completing and



maintaining the upgrades, and the extent to which these upgrades benefit other BellSouth operations (including retail) or UNE products other than line sharing.

35. Please describe in detail any additional costs associated with BellSouth's use of the bantam test jack for CLEC line sharing splitters, including the specific amount of additional costs, where those costs are found the line sharing cost study, and the work activities and personnel associated with those costs.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Please provide copies of the following documents pertinent to BellSouth's most recent fiber placement projects in the state of Tennessee:

- Requests for Proposals (RFPs) submitted to telecommunications contractors who provide BellSouth construction services.
- Copies of the RFP that was accepted.
- Copies of any contract or agreement that governed the project including any documents that detailed the rates, terms and conditions by which the chosen contractor would provide BellSouth services pertinent to the project.

2. For each of the 5 most recent projects for which information is provided in response to the request above, please provide documentation detailing any amount of BellSouth engineering or other labor that was expended on each project.

3. Please provide any documentation provided to BellSouth's employees explaining the BellSouth Corporate Facilities Database or any other database that houses electronic maps of BellSouth's outside plant facilities in Tennessee.

4. Please provide BellSouth's five most recent invoices for purchasing 96-port line sharing splitters.

5. Please provide a copy of any contract or agreement that governs the rates, terms,

and/or conditions by which BellSouth purchases the splitter equipment discussed in the question above.

6. To the extent the invoices would differ, please provide BellSouth's five most recent invoices for purchasing splitters used by BellSouth to provision its FastAccess DSL service or any other retail/wholesale ADSL offering.

7. Please provide a copy of any contract or agreement that governs the rates, terms, and/or conditions by which BellSouth purchases the splitter equipment discussed in the question above.

8. Please provide copies of any BellSouth internal capital budget documentation wherein capital is budgeted toward facilitating CLEC line sharing arrangements. Your complete answer will include any internal memorandums, any notes from Board Meetings, or any email discussions wherein capital was budgeted, or budgeted capital was anticipated, to meet BellSouth's obligations pursuant to the FCC's Line Sharing Order.

9. Please provide any and all agreements in effect within the past 4 years, between BellSouth and any telecommunications contractor relating to the placement, rearrangement, repair, removal or provisioning of outside plant facilities.

10. Please provide copies of any collective bargaining agreements, other employment agreements, or other documents that detail the terms, conditions, or rules by which BellSouth employees undertake the placement, rearrangement, repair, removal or provisioning of outside plant facilities, including specifically any such documents which prohibit anyone other than a BellSouth employee from performing these tasks.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker

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Joshua M. Bobeck  
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Joshua M. Bobeck, Esq.  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, Suite 300  
Washington, DC 20007

Counsel for Broadslate Networks

## CERTIFICATE OF SERVICE

I do hereby certify that I have this 1<sup>st</sup> day of November, 2000 served a true and correct copy of the foregoing via facsimile\* and/or United States Mail to the following parties of record:

Guy M. Hicks BellSouth Telecommunications, Inc. 333 Commerce Street Suite 2101 Nashville, TN 37201-3300	James B. Wright United Telephone 14111 Capital Boulevard Wake Forest, NC 27587-5900	Clay Arendes Vectris Telecom, Inc. 6500 River Place Blvd. Building 2, Suite 200 Austin, TX 78730
James P. Lamoreux AT&T 1200 Peachtree Street NE Room 4060 Atlanta, GA 30309	Charles B. Welch, Jr. Farris, Mathews, Branan, Bobango & Hellen 618 Church Street Suite 300 Nashville, TN 37219	T.G. Pappas R. Dale Grimes Bass, Berry & Sims 315 Deadrick Street Suite 2700 Nashville, TN 37238-002
Eric J. Branfman Swidler, Berlin, Shereff, Friedman 3000 K Street, Suite 300 Washington, DC 20007-5116	Susan Berlin MCI Telecommunications d/b/a MCI WorldCom 6 Concourse Parkway Atlanta, GA 30328	Bennett Ross BellSouth Telecommunications 675 West Peachtree Street Suite 4300 Atlanta, GA 30375
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